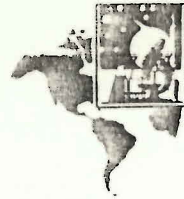


CONAP

CONTROLLED MATERIALS APPLICATIONS



CONAP

1405 BUFFALO STREET

OLEAN, NEW YORK 14760

PHONE (716) 372-9650

January 17, 1984

Mr. Ernest A. Regna
Chief, Solid Waste Branch
Air and Waste Management Division
U.S. Environmental Protection Agency, Region II
26 Federal Plaza
NEW YORK NY 12078

JAN 27 3 16 PM '84
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10007

RE: EPA Identification Number: NYD0962297544
Facility Location: Same
Inspection Date: June 30, 1983
Correspondence: Your letter dated December 9, 1983

Dear Mr. Regna:

With regards to your directive, please find enclosed the following:

- A. A copy of our Contingency Plan and Emergency Procedures which covers 40 CFR 265 Subpart D & 40 CFR 265 Subpart C.
- B. A copy of a Hazardous Materials Training Record Form.
- C. A detailed written procedure which insures that hazardous waste in containers is on site for no more than the required 90 days.

With regards to continued training, the following has been done:

- A. The writer has been designated as Environmental Co-ordinator and will attend seminars on hazardous waste management, to insure compliance with 40 CFR 265 (Personnel Training).

If there is any additional information you may require, or any way in which I can be of further help, please feel free to contact me at (716) 372-9650, extension 215.

Sincerely yours,

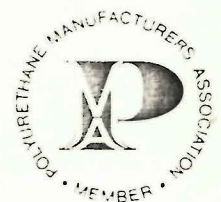
Louis D. Marino

Louis D. Marino
Environmental Co-ordinator
CONAP INC.

/o

Encl.

cc: R.A. Baker, Chief Permits Administration Branch, w/a
R. Mitrey, P.E., Regional Solid Waste Engineer, Region 9, w/a



A. (EXCERPT FROM THE CONAP SAFETY MANUAL)

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

This Contingency and Emergency Plan is designed to minimize hazards from fire, explosions and spills of any materials that may be hazardous to human health.

FIRE ALARMS

When a fire alarm sounds, all personnel are required to leave the building by the nearest exist and report to a pre-determined gathering point. The Foreman or his Assistant will be responsible for a roll call count of all persons in his department. This information will be relayed to the Emergency Coordinator.

Time is of extreme importance and employees will act as quickly as possible.

PRE-DETERMINED GATHERING POINTS

Office employees, shipping and Receiving Departments, P.I.C.	-	Parking lot in front of office building.
Casting Department, Maintenance Department	-	Front lawn to right of main driveway.
Laboratory, Quality Control, and Compound Departments	-	Front lawn to left of main driveway.

(EXCERPT FROM THE CONAP SAFETY MANUAL)

SPILLS

In the event of a spill or release of liquid the Emergency Coordinator will be informed so that he may supervise the clean up process. This procedure must take into account the type of exposure that is likely to occur. The primary problems are dust inhalation and skin contact. Organic diamines and higher amines: this class of compounds is generally harmful if ingested, inhaled, or absorbed through the skin. In general, clean-up procedures should be planned so as to avoid inhalation or skin contact.

1. Evacuate the immediate area of the spill.
2. Any persons who were in the immediate spill area should remove contaminated clothing, wash (shower) well with soap and water, and call a physician if needed.
3. Those assigned to clean up the spill should put on adequate protective equipment.
4. Rope off the area around the spill.
5. Contain the spill, then clean it up.
 - A. Dam the spill area with an absorbent material such as oiled sweeping compound, sand, or dirt. Cover the remainder of the spill with absorbent material. Let solidify. Shovel spill material into a container and seal for later disposal. If the spill has been in contact with the ground, remove an inch or so of soil and place it in the same container for later disposal.
 - B. For a dry powder spill gently wet down the area with water, spray or mist to reduce dusting. Shovel spill material into a container.

(EXCERPT FROM THE CONAP SAFETY MANUAL)

Cover any that is left on the floor with oiled sweeping compound, sand, or dirt. Carefully shovel and sweep the spill mixture into the same container for later disposal.

6. Thoroughly wash all equipment used in cleaning up the spill. Remove all personal protective equipment and wash with soap and water. Do not take clothing home to be washed.
7. Dispose of drums and contents in accordance with applicable federal, state and local laws and regulations.
8. After all material has been removed, remove rope.

(EXCERPT FROM THE CONAP SAFETY MANUAL)

EMERGENCY COORDINATOR AND ALTERNATES

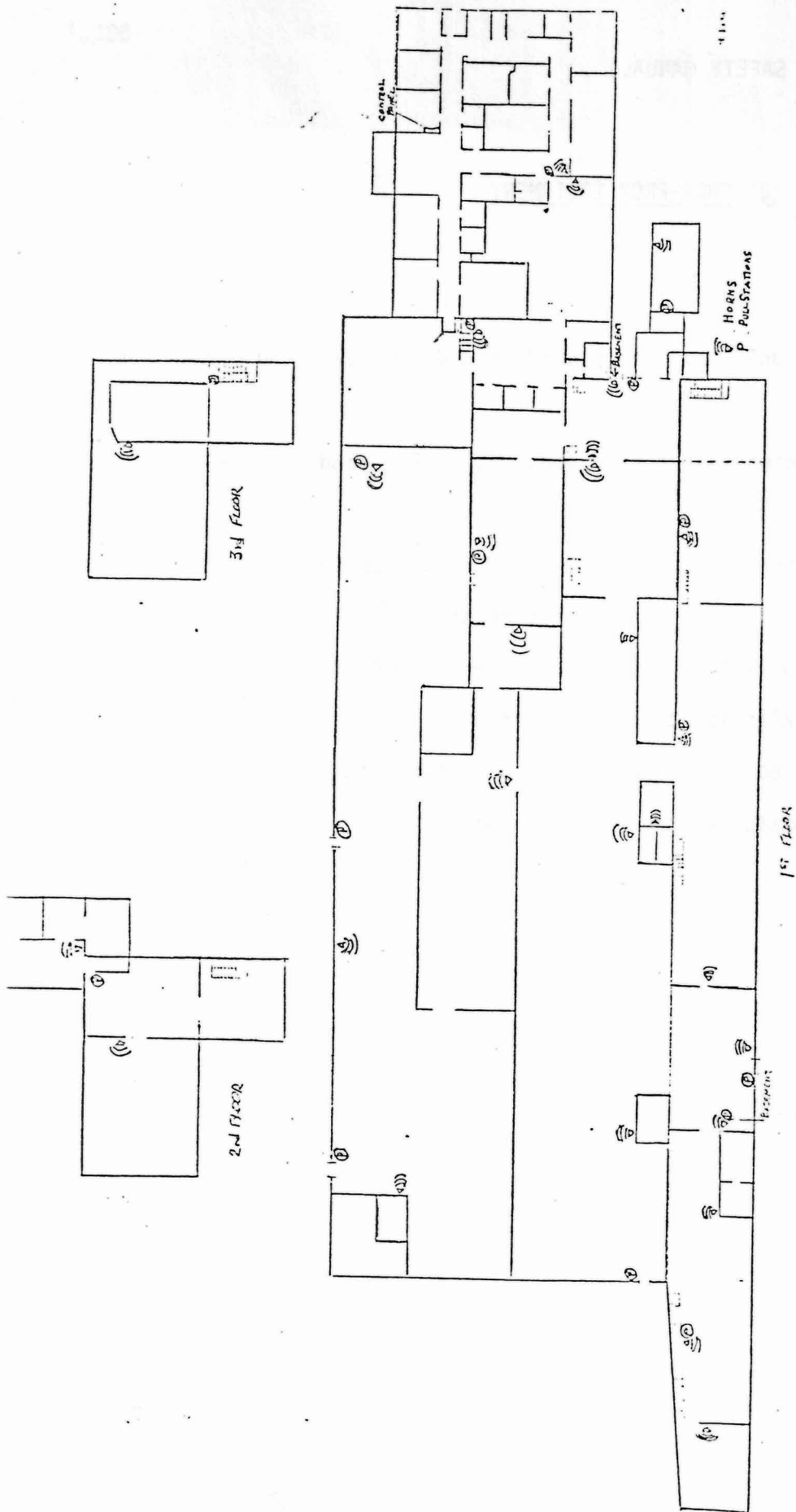
<u>CONTACT</u>	<u>OFFICE</u>	<u>HOME</u>
1. Richard Doran	1405 Buffalo Street Olean, New York 14760 716/372-9650	South Nine Mile Road Allegany, New York 14706 716/372-2292
2. Roland Cornell	1405 Buffalo Street Olean, New York 14760 716/372-9650	14 El Dorado Drive Allegany, New York 14706 716/372-6980
3. William Palladino	1405 Buffalo Street Olean, New York 14760 716/372-9650	R.D. #1, Lakeview Terrace Olean, New York 14760 716/372-8248
4. Fred Bristol	1405 Buffalo Street Olean, New York 14760 716/372-9650	11 Crestview Drive Franklinville, New York 14737 716/676-3184
5. Louis D. Marino	1405 Buffalo Street Olean, New York 14760 716/372-9650	137 W. Main Street Fillmore, New York 14735 716/567-8485

(EXCERPT FROM THE CONAP SAFETY MANUAL)

EMERGENCY EQUIPMENT

FIRE ALARM EQUIPMENT

1. Fifteen (15) manual pull stations placed around the plant and offices as per plant layout.
2. Twenty-eight (28) horns also placed around the plant and offices as per plant layout.
3. Eighteen (18) zone control panels that will be placed in the receptionist area and will be monitored by the receptionist.
4. Sixty-three (63) fire extinguishers located as per print.
5. Four (4) first aid kits located as per print.
6. Seven (7) air supplied respirators located as per print.
7. Three (3) fire blankets located as per print.



PULL STATIONS & HORNS

CONAP 1.000 T-400, BASIC

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
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(EXCERPT FROM THE CONAP SAFETY MANUAL)

COPIES OF CONTINGENCY PLAN

- A. A copy of this Contingency Plan will be distributed to all employees to be added to their Safety and Health Book.
- B. The Contingency Plan will be kept on file at CONAP and also sent to Wheelabrator-Frye, Inc., Des Moines, Iowa.
- C. The following individuals will receive copies of the Contingency Plan:
 - Chief Michael Luty, Olean Police Department, Olean, New York
 - Chief James Young, Olean Fire Department, Olean, New York
 - St. Francis Hospital, Olean, New York
 - Olean General Hospital, Olean, New York
 - Mrs. M. Cornell, Olean Civil Defense, Olean, New York
 - Mr. Fred Allen, Western District Office of Natual Disaster and Preparedness,
Batavia, New York

(EXCERPT FROM THE CONAP SAFETY MANUAL)

The following signatures indicate approval of this plan by the local Police Department, Fire Department and Civil Defense Authorities:

Michael Luty
Chief Michael Luty
Olean Police Department

July 7, 1981
Date

C. James Young
Chief James Young
Olean Fire Department

7 July 1981
Date

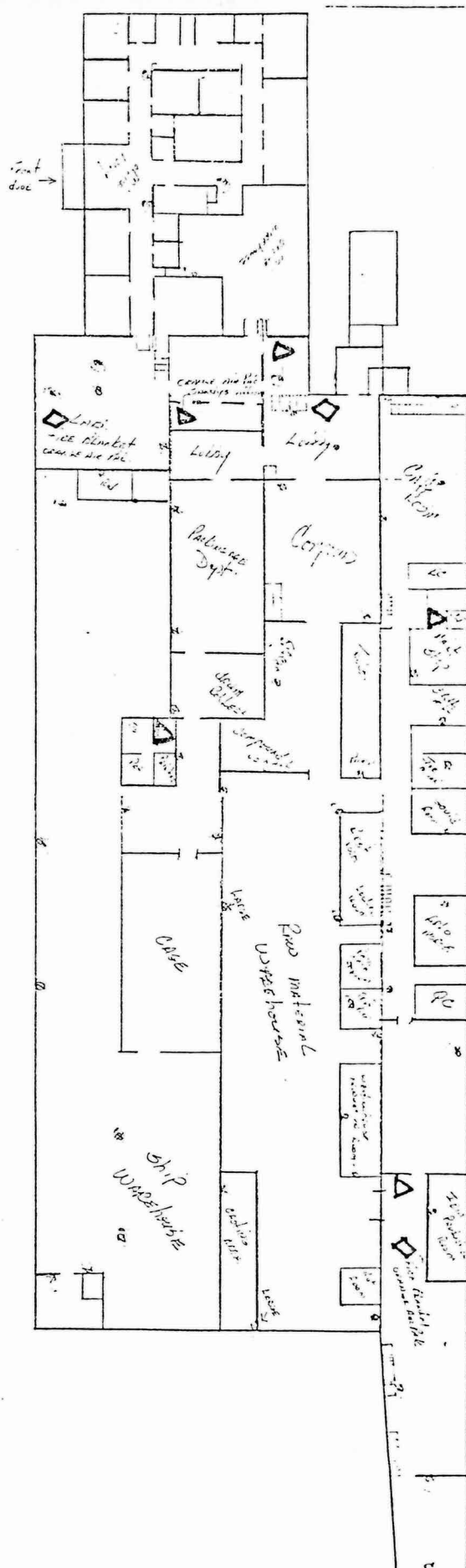
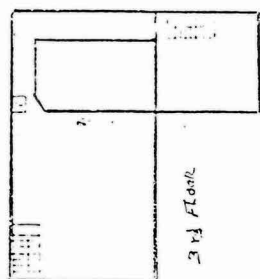
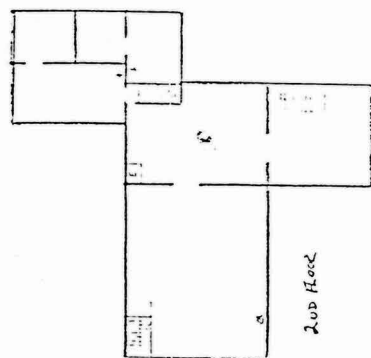
Mrs. M. Cornell
Mrs. M. Cornell
Civil Defense Director

7 July 1981
Date

(EXCERPT FROM THE CONAP SAFETY MANUAL)

CODES:

- △ - Fire Extinguisher
- △ - First Aid Kits
- Air Paks
- ◇ - Fire Blankets



CONAP - 10000 - 10000

DATE: _____

B. HAZARDOUS MATERIALS TRAINING RECORD

NAME: _____ SS#: _____

JOB OR TITLE: _____

HOW LONG IN PRESENT POSITION: _____ SUPERVISOR: _____

DATE OF TRAINING: _____ NAME OF INSTRUCTOR: _____

PLEASE INDICATE INSTRUCTIONS OR TRAINING RECEIVED:

	<u>YES</u>	<u>NO</u>
1. Lecture on Hazardous Materials:	_____	_____
2. Spill cleanup/migation:	_____	_____
3. Fire fighting:	_____	_____
4. Emergency response:	_____	_____
5. Use of respirators & self contained breathing equipment:	_____	_____
6. Location of Safety equipment:	_____	_____
* Pumps:	_____	_____
* Self contained breathing equipment:	_____	_____
* Respirators:	_____	_____
* Gloves, aprons, masks, etc. :	_____	_____
7. Do you handle waste materials in performing your job?	_____	_____
8. If answer to No. 7 is yes, what % of the time? Circle one: 10% 25% 50% 75% 100%		
9. Do you handle bulk chemicals (5 gallons or more)?	_____	_____

Employee's Signature

Supervisor's Signature

Instructor

Safety or Waste Mgr.

PROCEDURES FOR HANDLING DRUMMED WASTES

1. Do not use odd-sized (e.g. 30 lb. grease drums) containers for any waste material. Use only standard 55 gal. drums.
2. A label must be put on the top, not side, of the drum before it is first used to store waste material. The top of the drum must be clean, dry and free of grease at all times, so that the label will stick, and always be legible. The date the first material is put in the drum must be written on the label when the material is placed in the drum. By law, this date must still be clear and legible when the drum finally reaches the disposal site.
3. Labels must be filled in as per the attached sample, from the time the drum is first put into use as a waste container. Under Composition of Material put down the description of the material (oil, water, TDI, etc.) Do not mark physical state or hazard. These will be marked later by the Environmental Co-ordinator. When the drum is full, the foreman must legibly sign, date and fill in the department on the bottom of the label. Each label must have two dates: 1) the date the drum was first put into use as a hazardous waste container, and 2) the date it was finally filled, even if they are both the same.
4. Drum bungs (clamps on drums with removable tops) must NOT be tightened with a wrench, or any other means. Tighten the bungs hand tight only, and leave the clamps on the drum tops loose. Each drum must be sampled before it leaves CONAP. Drums without proper tops, including bungs and clamps in good condition, cannot be used for wastes of any kind.
5. Drums are to be placed in the designated area only. To insure that we can account for every drum at all times, each drum will be assigned a number and a master log will be kept.
6. Different materials, other than the one originally assigned to the drum when it was first put into use, can be added only if the material to be added is logged in on a form that will be attached to each drum, on a clip board. In this way we can be sure of just what is in each drum.
7. Solvent that is to be reclaimed will be treated in the same manner as a hazardous waste. (i.e. steps 1-6 must be followed.)

PROCEDURES FOR HANDLING DRUMMED WASTES

S T A R T

DATE: 1 / 19 / 84

WASTE
MATERIAL

COMPOSITION OF MATERIAL:

Name: _____ Dept: _____

F I N I S H

DATE: 1 / 19 / 84

WASTE
MATERIAL

COMPOSITION OF MATERIAL:

Name: J. Smith 3/1/84 Dept: Comp.